

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

CONSUMER 2.0, INC. d/b/a RENTLY,

Plaintiff,

v.

TENANT TURNER, INC.,

**SERVE: Brandon Anderson**  
**Registered Agent**  
**117 S. 14th St., Ste. 310**  
**Richmond, VA 23219**

Defendant.

Civil Action No. \_\_\_\_\_

**COMPLAINT**

Plaintiff, Consumer 2.0, Inc., doing business as “Rently”, by counsel, for its Complaint against Tenant Turner, Inc., states and alleges as follows:

**THE PARTIES**

1. Plaintiff, Consumer 2.0, Inc., doing business as “Rently” (hereinafter “Rently”) is a corporation organized and existing under the laws of the State of California, and having a principal place of business at 6300 Wilshire Boulevard, Suite 620, Los Angeles, CA 90048.

2. Upon information and belief, Tenant Turner, Inc. (“Tenant Turner”) is a corporation organized and existing under the laws of the State of Delaware.

3. Upon information and belief, Tenant Turner, has a regular and established place of business located at 117 S. 14<sup>th</sup> Street, Suite 310, Richmond, VA 23219.

4. Rently is informed and believes, and on that basis alleges, that Tenant Turner participated in and is in some manner responsible for the acts described in this Complaint and any damages resulting therefrom.

### **JURISDICTION AND VENUE**

5. This action, as hereinafter more fully appears, arises under the patent laws of the United States of America (35 U.S.C. §§ 1 *et seq.*), and is for patent infringement. Jurisdiction for all counts is based upon 28 U.S.C. §§ 1331, 1338(a) and (b).

6. Venue is proper under 28 U.S.C. § 1400(b) as Tenant Turner has committed acts of infringement in this judicial district and has a regular and established place of business located in this judicial district.

### **BACKGROUND OF THE CONTROVERSY**

7. Rently is a pioneer and nationwide leader in the development of software applications and systems for the self-access showing of real estate properties to prospective tenant and owner leads. Rently has an excellent reputation for the products and services that it provides which are marketed under its federally registered “Rently” and “Rently Keyless” trademarks. Rently is the owner of all right, title, and interest to several United States letters patents to protect its self-access systems and door entry systems related to automated property showings, namely U.S. Patent Nos. 9,875,590, 9,881,347, and 8,869,574.

8. A copy of United States Patent No. 9,875,590, “Automated Entry”, a method for providing automated entry to properties, is attached hereto as Exhibit 1.

9. Upon information and belief, Tenant Turner has been making, selling, using, importing and/or offering for sale a “Tenant Lead Scheduling Software” for use with electronic lockboxes, CodeBoxes, and similar locking devices. A copy of Tenant Turner’s website at [www.tenantturner.com](http://www.tenantturner.com) (hereinafter “Tenant Turner’ website”) illustrating the “Tenant Lead Scheduling Software” for use with electronic lockboxes, combo lockboxes, and CodeBoxes (hereinafter the “Accused Method”) is attached hereto as Exhibit 2. The Accused Method infringes one or more claims of Rently’s U.S. Patent No. 9,875,590.

10. Upon information and belief, Tenant Turner’s [www.tenantturner.com](http://www.tenantturner.com) website wherein the Accused Method is offered for license and/or sale is accessible nationwide, including in this judicial district. Tenant Turner, [www.tenantturner.com](http://www.tenantturner.com) (last visited June 26, 2018). Upon further information and belief, the Accused Method has been manufactured, imported, used, offered for license and/or sale, and/or sold to one or more property management and/or realtor entities within this judicial district.

**FIRST CLAIM FOR RELIEF**  
**(Patent Infringement of U.S. Patent No. 9,875,590)**

11. Rently realleges and repeats the allegations of paragraphs 1-10 above.

12. Rently is the owner of all right, title and interest in and to United States Patent No. 9,875,590 entitled “Automated Entry” (hereinafter the “’590 patent”) attached hereto as Exhibit 1. The ‘590 patent was duly and lawfully issued on January 23, 2018 and is presently valid and in full effect.

13. The ‘590 Patent is a method for providing automated entry to properties for invited visitors. The ‘590 Patent introduced the inventive concept of a system wherein a lockbox or similar locking device is placed at or near a property in order to enable an invited visitor to gain automated and unaccompanied entry into the property for a specified period of time. Under

the '590 Patent, the lockbox or similar locking device may be opened to facilitate the automated and unaccompanied entry by the invited visitor into the property. The '590 Patent eliminated the need existing at the time for an on-site property management or real estate professional to be present in order for an invited visitor to gain physical access to the property. Prior to Rently's invention, no other company in the field had reduced to practice the method and system set forth in the '590 Patent. The elements set forth in the '590 Patent both individually and in combination represent a novel approach for enabling an invited visitor to self-register and self-access a property in which they are interested.

14. Upon information and belief, Tenant Turner is directly infringing the '590 patent within this district and elsewhere in the United States by making, using, selling, importing, distributing and/or offering for sale or license a self-access system that infringes one or more of the claims of the '590 patent.

15. Upon information and belief, Tenant Turner is contributorily infringing the '590 patent within this district and elsewhere in the United States by making, using, selling, importing, distributing or offering for sale or license in the United States materials and/or apparatus for use in practicing the inventions set forth in the '590 patent, that Tenant Turner knows to be especially made or especially adapted for use in infringement of the invention embodied in the '590 patent. Upon information and belief, these materials and/or apparatus have no substantial non-infringing use in commerce.

16. Upon information and belief, Tenant Turner is inducing infringement of the '590 patent within this district and elsewhere in the United States by instructing in the use of materials, software, and/or apparatus that infringe one or more of the claims of the '590 patent. Specifically, Tenant Turner has induced others, including customers of Tenant Turner who

purchase and use the Accused Method, to infringe the ‘590 Patent by, for example, publishing promotional videos, on-line help and instruction manuals, presentations at trade shows, conferences, and other events, as well as distributing marketing materials which induce a user of the Accused Method to carry out all of the steps of one or more claims of the ‘590 Patent.

17. The Accused Method is the “Tenant Lead Scheduling Software” application for use with electronic lockboxes, combo lockboxes, CodeBoxes, and similar locking devices. An exemplar property management website implementing the Accused Method is depicted in Exhibit 3. The Accused Method infringes, literally and under the doctrine of equivalents, at least Claim 7 of the ‘590 patent.

18. The preamble of Claim 7 of the ‘590 patent indicates that the claim is for *A method for providing automated entry to properties*. A “help” page linked directly to Tenant Turner’ website demonstrates the Accused Method provides automated entry to a property: “Providing a licensed Realtor, prospective tenant, or maintenance vendor access to your vacant rentals when they need it is a very effective way to get your rentals leased quickly. This is called self-access, and when done using our electronic lockboxes and one-time use codes it is both quick and secure.” *Overview of Self-Access with Tenant Turner and Electric Lockboxes*, Tenant Turner, <http://help.tenantturner.com/codebox/overview-of-self-access-with-tenant-turner-and-electronic-lockboxes> (last visited June 26, 2018).

19. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 7 of the ‘590 patent of *making properties available for viewing to invited visitors*. A “help” page linked directly to Tenant Turner’s website demonstrates the Accused Method includes the element of making properties available for self-access viewings by visitors, including tenant leads: “To indicate your rental will allow for self-

access viewings, toggle it on.” *Viewings: Self-Access Viewings*, Tenant Turner, <http://help.tenantturner.com/viewings/viewing-availability/viewings-self-access-viewings> (last visited June 26, 2018); see *Assign a CodeBox to a Rental*, Tenant Turner, <http://help.tenantturner.com/codebox/assignment/assign-a-codebox-to-a-rental> (last visited June 26, 2018). Defendant conditions participation in or receipt of the benefit of self-access automated entry to a property under the Accused Method by requiring that a property be made available for self-access viewing by visitors.

20. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 7 of the ‘590 patent of *providing an application interface of an application running on a computing system to a property manager, the property manager being a manager or an owner of the property, the application interface prompting the property manager to enter a visitor name and contact information for a visitor, wherein upon receipt of the visitor name and contact information, the application provides the visitor with an invitation to receive automated entry information including code information that is valid during a specified period of time so that the visitor can enter the property by themselves, the invitation being delivered to the visitor electronically, the invitation being applicable only to the property and the invitation requesting identification from the visitor*. Exhibit 3, an exemplar property management website implementing Tenant Turner’s Accused Method along with “Help” pages linked directly to Tenant Turner’s website demonstrate Tenant Turner’s Accused Method includes all of these elements of Claim 7 of the ’590 Patent. See *Add a Lead*, Tenant Turner, <http://help.tenantturner.com/leads/lead-basics/add-a-lead> (last visited June 26, 2018); *CodeBox Quick Start Guide*, Tenant Turner, <http://help.tenantturner.com/codebox/codebox-quick-start-guide> (last visited June 26, 2018); *How Long are Generated Codes Good For?*, Tenant Turner,

<http://help.tenantturner.com/codebox/faqs/how-long-are-generated-codes-good-for> (last visited June 26, 2018); *Is there a Tenant Turner mobile phone app?*, Tenant Turner, <http://help.tenantturner.com/account-basics/account-basics-faqs/is-there-a-tenant-turner-mobile-phone-app> (last visited June 26, 2018); *Managing Qualified Leads*, Tenant Turner, <http://help.tenantturner.com/leads/lead-basics/managing-qualified-leads> (last visited June 26, 2018); *Overview of Self-Access with Tenant Turner and Electronic Lockboxes*, Tenant Turner, <http://help.tenantturner.com/codebox/overview-of-self-access-with-tenant-turner-and-electronic-lockboxes> (last visited June 26, 2018); *Screening Criteria*, Tenant Turner, <http://help.tenantturner.com/leads/advanced-lead-management/screening-criteria> (last visited June 26, 2018); *Send a Code*, Tenant Turner, <http://help.tenantturner.com/codebox/codes-and-access/send-a-code> (last visited June 26, 2018).

21. Upon information and belief, the Accused System includes, literally or under the doctrine of equivalents, the element of Claim 7 of the ‘590 patent of *placing a lockbox or an automated door lock at or near a property*. Defendant conditions participation in or receipt of the benefit of self-access automated entry to a property under the Accused Method by requiring the placement of an electronic lockbox, combo lockbox, CodeBox, or similar locking device at or near the property to which entry is sought before a tenant “lead” arrives. Tenant Turner offers for sale and sells CodeBoxes for use with the Tenant Leading Scheduling Software that are setup, shipped, “all access tracked” for visits to self-access viewable properties. *See Buy CodeBoxes*, Tenant Turner, <http://help.tenantturner.com/codebox/buy-codeboxes> (last visited June 26, 2018). In some instances, Tenant Turner provides the CodeBoxes free of charge to users. The element of *placing a lockbox or an automated door lock at or near a property* entails a physical act.

22. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 7 of the '590 patent of *upon the application receiving and confirming identification information from the visitor, providing, by the application, automated entry information to the visitor that allows the visitor to enter the property, the automated entry information including code information that is valid during the specified period of time.* Exhibit 3, an exemplar property management website implementing Tenant Turner's Accused Method along with "Help" pages linked directly to Tenant Turner's website demonstrate Tenant Turner's Accused Method includes all of these elements of Claim 7 of the '590 Patent. See *CodeBox Quick Start Guide*, Tenant Turner, <http://help.tenantturner.com/codebox/codebox-quick-start-guide> (last visited June 26, 2018); *How Long are Generated Codes Good For?*, Tenant Turner, <http://help.tenantturner.com/codebox/faqs/how-long-are-generated-codes-good-for> (last visited June 26, 2018); *Send a Code*, Tenant Turner, <http://help.tenantturner.com/codebox/codes-and-access/send-a-code> (last visited June 26, 2018).

23. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 7 of the '590 patent of *upon the visitor providing the code information to the lock box or the automated door lock at the property within the specified period of time, the lock box or automated door lock opening to facilitate automated entry to the property.* Exhibit 3, an exemplar property management website implementing Tenant Turner's Accused Method along with "Help" pages linked directly to Tenant Turner's website demonstrate Tenant Turner's Accused Method includes all of these elements of Claim 7 of the '590 Patent. See *CodeBox Quick Start Guide*, Tenant Turner, <http://help.tenantturner.com/codebox/codebox-quick-start-guide> (last visited June 26, 2018);



*How Long are Generated Codes Good For?*, Tenant Turner, <http://help.tenantturner.com/codebox/faqs/how-long-are-generated-codes-good-for> (last visited June 26, 2018); *Send a Code*, Tenant Turner, <http://help.tenantturner.com/codebox/codes-and-access/send-a-code> (last visited June 26, 2018). Defendant conditions participation in or receipt of the benefit of self-access automated entry to a property under the Accused Method by requiring that code information be provided to open the lock box or automated door lock within the specified period of time in order to facilitate automated entry to the property. The element of *the lock box or automated door lock opening to facilitate automated entry to the property* entails a physical act.

24. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 7 of the ‘590 patent of *tracking visitor activities at the property*. Tenant Turner’s “Tenant Lead Scheduling Software” keeps track of each rental property’s viewing activity in a Viewing Activity Report, notification of access to a CodeBox assigned to a rental property in a CodeBox Access Report, and tenant lead information showing the properties viewed by a lead and feedback left on the property in a Lead Activity Report. *CodeBox Quick Start Guide*, Tenant Turner, <http://help.tenantturner.com/codebox/codebox-quick-start-guide> (last visited June 26, 2018); *Notice of Access*, Tenant Turner, <http://help.tenantturner.com/codebox/codes-and-access/notice-of-access> (last visited June 26, 2018); *Reports Overview*, Tenant Turner, <http://help.tenantturner.com/reports/reports-overview> (last visited June 26, 2018).

25. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 7 of the ‘590 patent of *making information about the properties available within a user interface*. Exhibit 3, an exemplar property management

website implementing Tenant Turner's Accused Method along with "Help" pages linked directly to Tenant Turner's website demonstrate Tenant Turner's Accused Method includes all of these elements of Claim 7 of the '590 Patent. *See Managing Qualified Leads*, Tenant Turner, <http://help.tenantturner.com/leads/lead-basics/managing-qualified-leads> (last visited June 26, 2018); *Tenant Turner Listings Widget*, Tenant Turner, <http://help.tenantturner.com/company-setup/website-listings/tenant-turner-listings-widget> (last visited June 26, 2018); *Why are some of my leads highlighted in red?*, Tenant Turner, <http://help.tenantturner.com/leads/lead-faqs/why-are-some-of-my-leads-highlighted-in-red> (last visited June 26, 2018).

26. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 8 of the '590 patent of *making the information about the properties available includes allowing agents to claim leads for the properties*. "Help" pages linked directly to Tenant Turner's website demonstrate Tenant Turner's Accused Method includes all of these elements of Claim 8 of the '590 Patent. *See Get an Agent-Only Link for Your MLS*, Tenant Turner, <http://help.tenantturner.com/leads/advanced-lead-management/get-an-agent-only-link-for-your-mlsreports> (last visited June 26, 2018); *Locating Leads Using Reports*, Tenant Turner, <http://help.tenantturner.com/leads/advanced-lead-management/locating-leads-using-reports> (last visited June 26, 2018); *Managing Qualified Leads*, Tenant Turner, <http://help.tenantturner.com/leads/lead-basics/managing-qualified-leads> (last visited June 26, 2018); *Why are some of my leads highlighted in red?*, Tenant Turner, <http://help.tenantturner.com/leads/lead-faqs/why-are-some-of-my-leads-highlighted-in-red> (last visited June 26, 2018).

27. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 9 of the '590 patent of *making the information*

*about the properties available includes displaying a status for each property.* “Help” pages linked directly to Tenant Turner’s website demonstrate Tenant Turner’s Accused Method includes all of these elements of Claim 9 of the ’590 Patent. *See Activate a Rental*, Tenant Turner, <http://help.tenantturner.com/rentals/imports/activate-a-rental> (last visited June 26, 2018); *CodeBox Quick Start Guide*, Tenant Turner, <http://help.tenantturner.com/codebox/codebox-quick-start-guide> (last visited June 26, 2018); *Reports Overview*, Tenant Turner, <http://help.tenantturner.com/reports/reports-overview> (last visited June 26, 2018).

28. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 10 of the ’590 patent of *making the information about the properties available includes displaying identification of an agent that is assigned to each property.* The “Help” page linked directly to Tenant Turner’s website demonstrate Tenant Turner’s Accused Method includes all of these elements of Claim 10 of the ’590 Patent. *See Assign a Rental to a User*, Tenant Turner, <http://help.tenantturner.com/rentals/rental-settings/assign-a-rental-to-a-user> (last visited June 26, 2018).

29. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 11 of the ’590 patent of *making the information about the properties available includes displaying contact information for each property.* Exhibit 3, an exemplar property management website implementing Tenant Turner’s Accused Method along with “Help” pages linked directly to Tenant Turner’s website demonstrate Tenant Turner’s Accused Method includes all of these elements of Claim 11 of the ’590 Patent. *See Assign a Rental to a User*, Tenant Turner, <http://help.tenantturner.com/rentals/rental-settings/assign-a-rental-to-a-user> (last visited June 26, 2018); *Managing Qualified Leads*, Tenant

Turner, <http://help.tenantturner.com/leads/lead-basics/managing-qualified-leads> (last visited June 26, 2018).

30. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 12 of the '590 patent of *making the information about the properties available includes displaying a last activity date for each property*. The “Help” page linked directly to Tenant Turner’s website demonstrates Tenant Turner’s Accused Method includes all of these elements of Claim 12 of the '590 Patent. *See Reports Overview*, Tenant Turner, <http://help.tenantturner.com/reports/reports-overview> (last visited June 26, 2018).

31. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 13 of the '590 patent of *making the information about the properties available includes displaying a last activity for each property*. The “Help” page linked directly to Tenant Turner’s website demonstrates Tenant Turner’s Accused Method includes all of these elements of Claim 13 of the '590 Patent. *See Reports Overview*, Tenant Turner, <http://help.tenantturner.com/reports/reports-overview> (last visited June 26, 2018).

32. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 14 of the '590 patent of *allowing an administrator to select which types of communications about a property are forwarded to an agent assigned to the property*. The “Help” pages linked directly to Tenant Turner’s website demonstrate Tenant Turner’s Accused Method includes all of these elements of Claim 14 of the '590 Patent. *See Automated Agent for Phone Calls*, Tenant Turner, <http://help.tenantturner.com/company-setup/phone-calls/automated-agent-for-phone-calls> (last visited June 26, 2018); *Manage Users*, Tenant Turner, <http://help.tenantturner.com/company-setup/users-and-portfolio->

[structure/manage-users](#) (last visited June 26, 2018); *Tenant Turner Add Ons*, Tenant Turner, <http://help.tenantturner.com/company-setup/tenant-turner-add-ons> (last visited June 26, 2018).

33. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 15 of the '590 patent *wherein the types of communications about the property include at least one of the following: a phone call; a text message; an email*. The "Help" pages linked directly to Tenant Turner's website demonstrate Tenant Turner's Accused Method includes all of these elements of Claim 15 of the '590 Patent. *See Automated Agent for Phone Calls*, Tenant Turner, <http://help.tenantturner.com/company-setup/phone-calls/automated-agent-for-phone-calls> (last visited June 26, 2018); *Manage Users*, Tenant Turner, <http://help.tenantturner.com/company-setup/users-and-portfolio-structure/manage-users> (last visited June 26, 2018); *Tenant Turner Add Ons*, TENANT TURNER, <http://help.tenantturner.com/company-setup/tenant-turner-add-ons> (last visited June 26, 2018).

34. Upon information and belief, the Accused Method includes, literally or under the doctrine of equivalents, the element of Claim 16 of the '590 patent of *listing a second property as available for scheduling when the second property is not ready for viewing and there are no times advertised anywhere when the second property will be ready and available for viewing; providing a selection option which a visitor using the portable device can select to indicate a desire to enter the second property; upon the application receiving a visitor request to enter the second property, notifying the visitor once the second property is ready for viewing and there are times when the property will be ready and available for viewing*. The "Help" page linked directly to Tenant Turner's website demonstrates Tenant Turner's Accused Method includes all of these elements of Claim 16 of the '590 Patent. *See Viewings: Wait List*, Tenant Turner,

<http://help.tenantturner.com/viewings/viewing-availability/viewings-wait-list> (last visited June 26, 2018).

35. Tenant Turner also induces infringement of Claims 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16 of the ‘590 Patent by inducing or encouraging third parties to make, use, sell, or offer to sell the “Tenant Lead Scheduling Software” with electronic lockboxes, CodeBoxes, and similar locking devices to practice the Accused Method. Rently is informed and believes Tenant Turner induces or encourages third parties to practice the Accused Method through its sales, promotions, and demonstrations of the “Tenant Lead Scheduling Software” with lockboxes and CodeBoxes. Rently is further informed and believes that Tenant Turner develops and markets the “Tenant Lead Scheduling Software” for use with lockboxes for integration with partner third-party applications, thereby increasing the user base of the Accused Method. Tenant Turner’s customers and partners directly infringe the ‘590 Patent because they use, sell, or offer for sale the Accused Method. Tenant Turner knew that use of the “Tenant Lead Scheduling Software” with lockboxes and CodeBoxes infringes independent Claim 7 of the ‘590 Patent prior to the filing of this Complaint and knew at least as of the date of the filing of this Complaint that it also infringers dependent Claims 8-16 of the ‘590 Patent.

36. Upon information and belief, by the acts of patent infringement herein complained of, Tenant Turner has made substantial profits to which it is not entitled.

37. By reason of the aforementioned acts of Tenant Turner, Rently has suffered great damage in an amount which cannot be ascertained at this time.

38. On or about April 27, 2018, Rently sent a cease and desist letter to Tenant Turner demanding that it cease and desist from any further manufacture, use, importation, sale, and/or

offer for sale of the Accused Method. Attached hereto as Exhibit 4 is a true and correct copy of this correspondence.

39. Notwithstanding, Tenant Turner continues to infringe Rently's '590 patent, and will continue to infringe Rently's '590 patent to Rently's irreparable harm, unless enjoined by this Court.

40. Tenant Turner is aware of the '590 patent and nonetheless continue to knowingly infringe the claims of the '590 patent and such knowing infringement constitutes willful infringement. Any continuing infringement of the '590 patent by Tenant Turner after receiving notice of the '590 patent will be willful, entitling Rently to enhanced damages.

#### **PRAYER FOR RELIEF**

WHEREFORE, Rently prays for judgment against Tenant Turner as follows:

A. A judgment that Tenant Turner has directly infringed, contributorily infringed, and/or induced infringement of the '590 patent.

B. A judgment that Tenant Turner's infringement of the '590 patent has been willful.

C. Injunctive relief pursuant to 35 U.S.C. § 283, enjoining Tenant Turner, and all persons in active concert or participation with it, from any further acts of infringement, contributory infringement or inducement of infringement of the '590 patent.

D. An order, pursuant to 35 U.S.C. § 284, awarding Rently damages adequate to compensate Rently for Tenant Turner's infringement of the '590 patent, in an amount to be determined at trial, but in no event less than a reasonable royalty.

E. An order, pursuant to 35 U.S.C. § 284, trebling all damages awarded to Rently based on Tenant Turner's willful infringement of the '590 patent.

F. An order, pursuant to 35 U.S.C. § 285, finding that this is an exceptional case and awarding to Rently its reasonable attorneys' fees and expenses incurred in this action.

G. That Rently have such other and further relief that the Court may deem just and proper.

**Plaintiff Demands a Trial by Jury on All Issues So Triable.**

Dated: July 3, 2018

**CONSUMER 2.0, INC., d/b/a RENTLY**

By Counsel

/s/ R. Braxton Hill, IV

R. Braxton Hill, IV (VSB No. 41539)  
Roman Lifson (VSB No. 43714)  
Shannan Fitzgerald (VSB No. 90712)  
CHRISTIAN & BARTON, L.L.P.  
909 East Main Street, Suite 1200  
Richmond, Virginia 23219-3095  
Tel.: (804) 697-4100  
Fax: (804) 697-4112  
[bhill@cblaw.com](mailto:bhill@cblaw.com)  
[rlifson@cblaw.com](mailto:rlifson@cblaw.com)  
[sfitzgerald@cblaw.com](mailto:sfitzgerald@cblaw.com)

Stephen Z. Vegh, Esq. (*Pro Hac Vice* Pending)  
1240 Rosecrans Ave. #120  
Manhattan Beach, CA 90266  
Tel.: (310) 980-7440  
[svegh@veghlaw.com](mailto:svegh@veghlaw.com)

*Attorneys for Consumer 2.0, Inc.  
doing business as Rently*